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Federal Communications Commission
Office of the Secretary
445 12th Street, SW, Room TW-A325
Washington, DC 20554

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Re: Framework for Next Generation 911 Deployment, NOI / PS Docket No. 10-255

Shadow Me Security submits these reply comments on the Federal Communications Commission ("FCC") Notice of Inquiry ("NOI") issued on December 21, 2010. Shadow Me core philosophy is in accord with the sentiment that "competitive forces and technological innovation have ushered in an era of advanced Internet-Protocol (IP)- based devices and applications that have vastly enhanced the ability of the public to communicate and send and receive information".

It is our belief that what NG-911 seeks to achieve, as referenced in the NOI, has already been developed and commercially deployed by Shadow Me Security. Shadow Me, the firm's flagship personal security product is the first collaborative security solution that empowers individuals to take control of their own security by integrating seamlessly with the existing security infrastructure. The full-featured, user-controlled personal security application works on any phone, on any network, anywhere in the world and. In addition to the application's device and geographic coverage, features include: GPS location, GPS breadcrumbs, automated system check-in, user – defined emergency response and notifications, integration with emergency management and law enforcement, an always on panic button, a full featured user profile including picture, medical information, contacts, address, and other critical information as well as pin-less outbound conference calling . All of which can enhance the FCC's 911 current and future systems.

Shadow Me has not previously worked with the FCC or any other 911 system developers. Shadow Me Security has instead developed a one of a kind product to answer growing consumer demand for an always available personal security service accessible via existing mobile devices on existing networks.

The attached pages provide specific answers to the Notice of Inquiry that we believe are already addressed by Shadow Me Security's patent pending global personal security system.

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The following numbered paragraphs are from the Notice of Inquiry (NOI) with corresponding responses that apply to Shadow Me Security (SME) areas of experience listed below.

27	<p>While, as detailed above, the 911 system has been adapted to accommodate wireless and interconnected VoIP services, the success of the 911 system, combined with the antiquated aspects of today's 911 infrastructure and the development of advanced IP-based devices and applications in the telecommunications industry overall, creates a gulf between consumer assumptions about the system's robust capabilities and its actual limitations. Indeed, there is widespread concurrence among academics, industry experts, and politicians that "the current communications landscape is a far cry from the one for which the current 9-1-1 system was engineered" and, furthermore, that "our emergency communications networks are unable to accommodate what is increasingly viewed as basic functionality inherent in many of today's technologies."⁵⁷ In short, because 911 service was designed to succeed in the legacy wireline telephone environment, there are unmet consumer expectations concerning emergency service capability and reliability across new communications technologies (such as text messaging requests for help, sending IP-based information, including medical data, photos, videos, car collision telemetry, environmental sensors, gun shot sensors, etc. via smartphones, and delivering precise location information from behind MLTS systems).</p>
<p>Shadow Me currently provides law enforcement / safety personal / first responders with immediate detail information via email, text and voice to law enforcement and safety professionals. Shadow Me provides GPS location, personal information (including picture, physical description) medical information, contacts, intended destination or activity.</p>	
28	<p>The deployment of and transition to NG911 presents multiple opportunities for the benefit of public safety and homeland security. First, replacing today's system with a broadband-enabled, IP-based 911 network will offer far more flexibility, resilience, functionality, innovation potential, and competitive opportunities than is presently possible. NG911 holds the promise to bridge the gap between traditional means of voice-based communications and the advanced capabilities already in widespread use by consumers using smartphones, netbooks, and advanced wireless 4G. In particular these digital devices have powerful processor and storage capabilities and are capable of transmitting not only voice communications, but also text, data, telemetry, image, and video signals, which have benefits to particular communities such as persons with disabilities. Unlike the circuit-switched technology that lies at the heart of the legacy 911 system, today's wireless networks increasingly use all-digital packet switched technology based upon the Internet Protocol suite.⁵⁸ Thus, while these networks are capable of conveying text, data, image, and video in addition to voice, the legacy 911 systems are not capable of receiving or processing these communications, and will not be until NG911 is deployed across the country.</p>
<p>Shadow Me does not require any new / specific device, network, or location. All that is necessary is for the first responders contact information be added to the escalation tree of Shadow Me users. This can be done automatically for all users. Shadow Me works on any device, any network anywhere in the world over wireless and WiFi networks.</p>	



29	<p>The adoption of broadband IP-based technology also creates the potential for our 911 system to accommodate a full range of specialized devices and functionalities tailored to particular emergency response scenarios. For example, NG911 could permit the simultaneous transmission of critical health data along with a 911 call for help, both from the “caller” seeking assistance to a dispatcher, and back out from a dispatcher to a first responder arriving on scene or to an emergency room receiving the patient. Likewise, a vehicle’s Automatic Collision Notification System could automatically call for help while conveying other relevant information such as the vehicle’s location and the severity of the crash. NG911 will also enable 911 call routing based on caller characteristics, not just the location of the call. For American Sign Language. In this situation, rather than routing the call to the “geographically appropriate” PSAP, it may be preferable to enable the 911 system to route the 911 call to a PSAP that is video-enabled and has a 911 call taker prepared to respond to the caller using the caller’s native sign language. NG911 will permit this to happen. NG911 will also create the ability to utilize a “virtual PSAP.” Today’s 911 system generally requires a call taker to answer a 911 call from within the walls of a physical PSAP. In a NG911 network, however, a call taker will be able to answer a 911 call from virtually any location. This capability will be particularly advantageous during disasters and high call volume situations. NG911 will also complement the deployment of related next generation emergency communications networks, such as next generation alerting systems and advanced public safety broadband networks.</p>
	<p>Shadow Me already has the capability to store and transmit medical data to first responders.</p> <p>Shadow Me already has the capability to store and transmit video and voice information to first responders in the event of an emergency or an escalation.</p> <p>Shadow Me is a web-based application that is accessible via any computer or mobile device that can connect to the internet.</p>
31	<p>In this section, we review the potential capabilities that the deployment of NG911 systems will provide to the public, and the likely architecture of NG911 networks. We seek comment on each of these elements as a component of NG911. Are there core elements that should be part of every NG911 system and standardized across all NG911 deployments? Are there non-core elements that could be part of NG911 but are optional or can be varied locally? How will these elements (both core and non-core) be affected by future technological change?</p>
	<p>Bilateral Mass Notification Systems – Current Mass Communications technologies such as Blackboard are one-way broadcast systems. Shadow Me enables two-way communication between individuals and the message originator.</p> <p>Collaborative Security – Shadow Me allows other users to report / escalate to first responders on behalf of another in case the other user is incapacitated and in need of assistance.</p>
33	<p>Message-Based Text. When using message-based text, two or more parties have the ability to send complete, typically short, text messages to each other. Examples include Short Message Service (“SMS”), instant messaging (“chat”) sessions, or web-based tools. To send a message-based text, a user must make an explicit action, such as hitting an SMS send key, or the return key on a keyboard. Chat sessions are bidirectional through their protocol definition. While services such as SMS consist of independent messages, they may be presented to the user as a thread of back-and-forth messages..</p>
	<p>We agree. Shadow Me currently provides this capability.</p>



34	Real-Time Text. “Real-Time Text (RTT) is conversational text that is generally sent and received on a character-by-character basis. The characters are sent immediately (in a fraction of a second) once they are typed and are also displayed immediately to the receiving person(s). This functionality allows text to be used in the same conversational mode as voice.” ⁶³ RTT is viewed by many in the disability community as a replacement for the dated TTY technology and preferable, from a human interface perspective, to message-based text, as it more closely approximates the speed and flow of human voice conversation. ⁶⁴ RTT also prevents messages from crossing each other during a call, and for this reason may be preferred over SMS as a means of facilitating the exchange of information between the caller and the PSAP dispatcher.
We agree. Shadow Me currently provides this capability.	
35	Still Images (Photos). Still images are captured by a digital camera, typically encoded into a compressed file format, such as JPEG, and made available as a single data object (file). Still images may help 911 call takers and first responders assess the severity of an incident or apprehend a criminal suspect.
We agree. Shadow Me currently provides this capability.	
37	Telemetry Data. Telemetry data includes all sensor measurements that quantify physical, chemical, or biological phenomena. Examples include vehicular information (such as current speed and crash-related data), biological and environmental sensors that measure wind and temperature, and physiometric sensors that measure human pulse rates..
We agree. Shadow Me currently has the capability to read, store and transmit this data.	
38	Auxiliary Medical and other Personal Data. Auxiliary data would include relevant information about the caller’s medical conditions and particular treatment needs, as well as information related to those categories. Such information could be provided on a prior-consent basis to the PSAP for forwarding to EMS personnel or other first responders.
We agree. Shadow Me currently provides this capability.	
40	The Commission seeks comment on what primary and secondary media types PSAPs and service providers will likely support. Should individual PSAPs be able to choose the media types that they will support, or should all PSAPs be expected or required to support a specific set of media types? ⁶⁵ Should different standards or requirements apply to primary conversational media as opposed to secondary non-conversational media? If secondary non-conversational media include the capability to transmit sensitive personal data, what privacy protection concerns are raised and how should they be addressed? Would changes in current laws, regulations, tariffs, and overall policies be needed to enable NG911 to support these media types and system features?
Shadow Me believes all readily available data should be considered primary as the inclusion of these data elements can facilitate the immediate development and transmission of a complete investigatory package for first responders.	



41	<p>In light of the popularity and ubiquity of SMS, many consumers may assume that they are or will soon be able to text to 911. Indeed, consumer use of SMS has exploded in the past decade and billions of SMS messages are sent each day. Also, unlike some of the other media types discussed above, SMS is readily available on most mobile phones, and thus its implementation into the NG911 network may be one of the first steps in moving beyond a voice-only emergency calling framework. SMS, however, has limitations that will need to be addressed if it is to become a reliable means for emergency communications. For example, a recent study noted that SMS is an asynchronous messaging service that does not provide a means for the sender to know whether and when the message has reached its destination. In addition, the study noted that because each SMS is independent of its predecessors, it is difficult to ensure that messages within the same logical conversation are routed to the same destination.</p>
<p>It is for this reason Shadow Me Provides bi-lateral communications so that an SMS recipient can respond affirmatively that the message was, in fact received.</p>	

42	<p>Given these limitations, we seek comment on how the increasing use of SMS may impact emergency communications and whether NG911 networks should be configured to support SMS emergency communications. For example, are there any proposed technical standards or approaches⁷⁰ that would sufficiently address routing and location concerns? Further, will it be possible to use the existing short code system to reach PSAPs? Are there measurement results for mobile-to-fixed messaging that indicate the reliability and delay of SMS delivery under specified circumstances? Would it be possible to add location information to SMS messages to help in routing such messages and, if so, how? Would it be possible to maintain session continuity across messages, e.g., at the gateway between the cellular network and the IP network? Can end-system SMS applications address some of the location-related issues, e.g., waiting to send an emergency SMS until location information has been acquired? Have there been trials or operational experiences using SMS within the NG911 architecture? Should SMS be considered primarily as a fall-back mechanism when voice communications are difficult or impossible to transmit? As wireless systems evolve to IP based 4G architectures, can the reliability and features of SMS messaging be improved for the purposes of emergency communications and if so, how?</p>
<p>Shadow Me employs a patent pending technology that provides an encrypted SMS message via a proprietary routing system that ensures persistence and accuracy in routing.</p> <p>It is possible to add location information to SMS messages to help in routing such messages via Shadow Me.</p> <p>Shadow Me maintains session continuity across messages, e.g., at the gateway between the cellular network and the IP network. SME maintains the "chat" session with chain of conversation.</p> <p>Yes, SMS applications address some of the location related issues, e.g., waiting to send an emergency SMS until location information has been acquired. The inclusion of Geo fencing and GPS coordinates are ways to mitigate this issue. Shadow Me currently supplies GPS coordinates, we in the process of rolling out geo-fencing for specific customers.</p>	



43	<p>We also seek comment on existing and future public expectations related to the use of SMS for emergency communications. Do consumers understand that currently available SMS generally does not support sending text messages to 911? Could the implementation of NG911 lead to changes in consumer expectations and public misunderstandings about SMS capabilities? Is there a need for programs to educate the public about the limitations of SMS for emergency communications, and if so, what entity should be responsible for developing such programs? Are there liability issues that could arise if consumers unsuccessfully attempt to use SMS for emergency communications?</p>
	<p>Consumers will need to be educated on the efficacy and use of new means of contact first responders. Shadow Me has already started programs on many campuses to address these very issues. Shadow Me is already changing people's perceptions about the quality and timeliness of their communications with first responders.</p> <p>Yes, there are Liability concerns by relying solely on SMS for emergency situations. That is why Shadow Me provides emergency notifications and contact via automated voice conferencing, email / IP, and SMS means.</p>
46	<p>The Commission recognizes the significant public safety interest in ensuring that non- English speakers have access to emergency services. We seek comment on what media types non-English speakers likely will use to make an emergency call in an NG911 environment. What types of devices may non-English speakers use to make an emergency call in an NG911 environment? How can the Commission ensure that non-English speakers receive the appropriate benefits from the NG911 system?</p>
	<p>Because Shadow Me is IP based software as a service, multi-language capabilities can be easily deployed.</p>
47	<p>The ability to share information – including medical information – could be of particular value to EMS and other first responders. Should such information be provided in the ordinary course to EMS and other first responders in a manner similar to the provision of medical condition information described in paragraph 37, supra? Since privacy protection concerns would seemingly be implicated in this case, as in the case of transmitted medical information, how should such concerns be addressed?</p>
	<p>Shadow Me provides the ability to store and transmit medical data, with the users permission. If the user enters / explicitly agrees to allow their medical information to be stored, Shadow Me can store and transmit this data.</p>



49	<p>In this section, we seek comment on the mechanisms that will be used to transport digital content across NG911 networks. In an IP-based NG911 architecture, unlike a circuit-switched architecture, a variety of protocols can be used to transport media types across the network from the 911 caller to the PSAP. For example, still images can be carried: (1) as Multimedia Messaging Services (MMS) sent by mobile devices, (2) as attachments to Internet e-mail, (3) within instant images and uploaded to social network services, or (4) on other web services. We note that a diverse mix of physical infrastructures, networking protocols, applications, and devices may facilitate the carriage of potential NG911 media types from a 911 caller to a NG911-enabled PSAP. For example, some carriage scenarios may rely solely on “pure” IP-based solutions, some may rely heavily on existing legacy infrastructure, and some may rely on gateway packet-based communications between callers and PSAPs. We seek comment on each of these technical approaches and request that commenters discuss operational, business, and other policy strengths and weaknesses of each approach. For example, while application of IP-based approaches has generally led to robust and unexpected innovations in communications technologies, PSAPs could face operational and funding burdens from supporting a large number of IP-based NG911 architectures, and resources could be diverted from technical solutions that incorporate standardized features and implementation approaches. Similarly, introduction of operational requirements such as reliability, scalability, and standardized technology could result in tradeoffs between various legacy, proprietary, end-to-end open-standard, or other approaches for IP-based NG911 systems. We request that commenters identify these tradeoffs, or other relevant tradeoffs, and discuss the relative strengths and weaknesses of these technical approaches.</p>
<p>Shadow Me believes that these systems be able to utilize any and every available transport protocol available. Shadow Me utilizes all cellular networks, IP – based networks (WiFi, WiMax) as well as proprietary networks unique to specific entities.</p>	

51	<p>In a NG911 environment, however, end user devices are far more likely to be liberated from a particular transport network. This treatment acknowledges important industry trends, such as the increasing portability of devices among service providers⁷⁸ open access possibilities, and the increasing use of user-selected IP-based devices that may exploit widely-available sources of Internet access. As such, the number of participants in an NG911 environment will increase dramatically. The table below lists the potential NG911 participants and their possible roles in an NG911 environment.</p>
<p>Any new NG911 system needs to account for the mobile nature of the intended users. Almost all users will be liberated from a traditional wired communication mechanism. Shadow Me is developed with the mobile user in mind and consequently works on any mobile device.</p>	

52	<p>Currently, only devices that provide telephone services are capable of transmitting 911 calls. In the future, however, most electronic devices will have communication capabilities, ranging from televisions, in-car systems, portable music players, tablet computers, and game consoles. We seek comment on what devices can usefully provide emergency calling services. Should every consumer device with Internet or cellular connectivity and a suitable user interface have the ability to request emergency assistance? Should such devices be certified and labeled as 911-capable? How will a user of a device or software be able to tell whether a device or communication software is capable of placing 911 calls? If this capability is conditional, e.g., on properly-configured network connectivity, can the user or device test 911 reachability?</p>
<p>The NG911 system should not rely on a new generation of devices. Devices should not need to be 911 ready. The new system should be deployable to any existing or new device. Shadow Me is capable of this.</p>	



55	<p>If there is a need to develop standards for digital information transported on NG911 networks, what entity should set and update these standards, or assist in their coordination? Should the standards be national or international? Are there standards efforts currently under way that could form the basis for future evolution in this regard? Should specific technical standards or architectures be mandated? How can the interoperability of end user devices and PSAP devices be ensured (e.g., through interoperability testing)? Should there be a certification process that indicates whether a device or downloadable software application is compliant with certain standards? If so, what form of certification seems to be the most suitable, e.g., self-certification or approved certification organizations? Should all devices of a certain class be required to meet the certification criteria? As more people – especially within the disability community – begin to make video-based telephone calls, are there steps needed to ensure that NG911 networks interoperate seamlessly with the video software and applications being utilized in smart phones, tablets, computers and other devices? Similarly, are there steps needed to ensure interoperability with the video communication services provided by all video relay service providers?</p>
<p>Currently, due to the immaturity of the market, no standards exist for the digital information transmitted via personal security systems. Shadow Me assumes that a set of minimum standards will be developed by international governing bodies for incorporation into such systems.</p>	
58	<p>Device-Initiated Services for Emergency Communications. In an IP-based network architecture, emergency calls can be placed not only by human beings, but by a variety of automatically triggered devices. Examples of such devices include environmental sensors capable of detecting chemicals, highway cameras, security cameras, alarms, personal medical devices, telematics, and consumer electronics in automobiles. We seek comment on how the deployment of NG911 will facilitate the ability of device-initiated emergency services to reach PSAPs. What steps are needed to facilitate such deployment? Is there a need to modify existing laws, regulations, or tariffs to ensure that device-initiated emergency services have access to the NG911 network?</p>
<p>Shadow Me Products offer the ability to escalate / create emergency notifications by any event trigger whether that be human or an automated triggered device such as a sensor, smoke detector, or camera. Any emergency response system should be able to accommodate the multiple trigger types in order to be effective.</p>	
59	<p>Social Media for Emergency Communications. How have consumers used social media to report an emergency or contact public safety during an emergency? How will consumers expect to use social media for emergency purposes in the future? To what extent might state and local public safety jurisdictions employ social media tools as a way to interact with the public? How will these tools impact the deployment of NG911?</p>
<p>While not originally intended for such purpose, social media is becoming ubiquitous as such Shadow Me believes that to ensure the broadest possible acceptance and adoption that social media mechanisms be incorporated to assist the users in accessing the emergency response services. As such Shadow Me currently integrates with social media mechanisms such as Facebook and Twitter.</p>	



60	<p>N11 Numbers and Other Services for Emergency Communications.⁸⁰ The basic functionality of NG911 is similar to many other location-based information and assistance services, such as 211 (community information and referral), 311 (non-emergency city services), 511 (traffic information), poison control, call-before-you-dig, and other similar services. Since these services share much of the same technical functionality, it may be possible to reduce cost and improve service by integrating some of these services to use a common technology platform. Further, callers may need to be transferred from one service to another, e.g., from 911 to 311 or 211. Can such coordination and integration be helpful and cut costs? How will the deployment of NG911 address N11 numbers, including N11 services such as 311, which is designated for non-emergencies? How will the deployment of NG911 impact other emergency services, such as poison control centers using 800 services? How will the deployment of NG911 affect TRS that use 711?</p>
<p>Numerous studies have been conducted on the use of text messaging versus traditional voice-only systems. Customers when given the option, more often choose text more than 60% of the time. Accordingly, the cost savings are substantial.</p>	
61	<p>Auxiliary Data. NG911 offers the opportunity to provide additional data to PSAPs and first responders, such as the caller's medical history, a description of the caller's residence or business location, and related data, including building floor plans, information about hazardous materials, and building occupants with special needs. This data will often be maintained and provided by third parties, such as health care organizations that maintain electronic medical records or commercial landlords that maintain floor plans. How should the PSAP be informed about the availability of this data? What entity should associate this information with the call or message, such as the application service provider or a third party? Is there a need for regulations that require an application service provider to supply these services, e.g., by providing the appropriate call signaling or lookup functionality? Is there a need for standards to ensure that PSAPs and first responders receive access to this data without every PSAP having to make individual arrangements with each data source? Since this auxiliary data may be considered part of the 911 call record and therefore subject to public disclosure, is there a need to protect the privacy of this data differently than the remainder of the call information?</p>
<p>Shadow Me currently provides the mechanisms to enter, store and transmit this data. Shadow Me does not see any reason why a regulated third party should be responsible for this.</p>	
62	<p>Disaster Planning and Recovery. How will NG911 facilitate disaster planning and recovery? How will NG911 interact with existing and future public alerting systems? Can national security be enhanced by the consistent implementation of interoperable NG911 systems across the nation? What key NG911 elements should be the focus for consistent implementation and interoperability?</p>
<p>Any NG911 system should have the ability to integrate seamlessly with existing notification and incident management systems / protocols. Shadow Me has this capability. No standards currently exist as to the interoperability of such systems. Shadow Me provides a standard integration framework that works with any commercially available or proprietary system.</p>	



65	<p>In light of these challenges, what actions should the Commission take to encourage the deployment of NG911? Have there been any recent developments that provide additional details on a potential timeline for NG911 deployment? Have there been any coordinated management efforts by state, Tribal, or local governments? Should there be a national set of milestones that provide a planning horizon? If so, what entity or entities should set those milestones, measure progress, and disseminate the measurement results? What are the milestones that will be useful to accelerate and measure NG911 deployment? What changes will need to take place in the emergency communications governance structures, at both the federal and non-federal levels, to facilitate NG911 planning and implementation? What policies can be established to enable and instigate the development and deployment of shared statewide ESInet, and related cooperative working agreements between federal, state, Tribal, and local agencies, as a fundamental 911 and emergency communications policy objective? Will waivers of certain rules and regulations be necessary during the transition to NG911? Should the FCC provide certain criteria for consideration of waiver grants?</p>
<p>Many private and public entities are already moving to adopt the Shadow Me technology; this proves there is both a strong desire to update emergency response with new technologies. Implementation plans vary by entity and geography, but a comprehensive phased implementation plan should be developed in advance of committing to the new technology. A set of common standards would help standardize and streamline the implementation for public and private entities.</p>	
66	<p>Because the transition to NG911 is likely to be gradual rather than a large scale “flash cut,” what can be done to ensure that NG911 networks interoperate seamlessly with legacy networks? PSAPs will likely offer different capabilities for both primary and secondary media types during the transition to NG911; however, consumers in need of emergency services will also expect a uniform experience. For example, it may confuse consumers if they can use IP-based devices and applications to reach a PSAP in one county, but cannot use them to reach a PSAP in a neighboring county. Will the deployment of NG911 permit statewide or nationwide PSAPs to uniformly support new emergency communication capabilities? We seek comment on whether a timetable or deadline should be established for all PSAPs to support a minimal set of NG911 capabilities. Should we implement a timetable or deadline to ensure that all primary media types can be used to contact 911? Should certain media types, such as message-based text, only be permitted for emergency purposes when a threshold percentage of PSAPs across the country can accept these media types? Is fallback routing acceptable, where larger regional entities handle media types, such as SMS, when the local PSAP cannot? If this is not the best path forward, how should consumers determine what media types they can use to reach emergency services in their locality? Should NG911-enabled devices be able to automatically discover the local NG911 capabilities?</p>
<p>Uniformity of experience is critical in deploying such systems. While the deployment can be phased the functions available should allow for standard user experience. This is the benefit of utilizing an existing product that is already in use in the US.</p>	



76	<p>As noted in the ICO Plan, new location-based technologies and applications have generated an increased demand for location services, yet the decoupling of originating service providers from network operators will make the delivery of real-time, automatic location information more challenging.⁹⁰ To what degree should federal regulations require that access providers provide call location data to end systems and/or voice service providers on reasonable and non-discriminatory terms, using standard protocol interfaces? How can stationary, nomadic, and mobile end systems in wireline and non-cellular wireless networks (including Wi-Fi) reliably discover their location information to ensure call routing and dispatch? What, if any, obligations need to be imposed on Internet service providers, residential and enterprise equipment vendors, and other parties to ensure that location information can be discovered, conveyed, and validated? Is there a need for a national or regional certification entity that will allow a provider of location information to cryptographically sign the location information?</p>
<p>Shadow Me does not rely on the network provider to generate a users location. With the users approval Shadow me uses a proprietary technology stack that tracks a users GPS coordinates. Reliance on the carriers for this information has historically proven to be challenging.</p>	

78	<p>What role will public information campaigns play in the transition to NG911? How can the Commission ensure that public safety personnel, consumers, and carriers are aware of NG911 deployments? What entities should lead and contribute to consumer education? Should the Commission foster common terms and terminology to facilitate the deployment of NG911? How can we ensure that other relevant organizations are aware of NG911's benefits, such as mobile health and telemedicine? Beyond the EAAC, how can we ensure that the disability community is involved with and aware of the transition to NG911?</p>
<p>Shadow Me believes that coupling a superior user experience to an effective education campaign is the key to the success of deploying new technologies such as NG911 and Shadow Me. The system must be easy to access, easy to interact with and always be "on." Shadow Me has achieved this with our flagship product. In conjunction with this Shadow Me develops a specific education program for our clients such as Universities, Sororities, and businesses. The education campaign consists of online, print, and electronic communications in conjunction with in person, onsite demonstrations.</p>	

82	<p>. Currently, an international traveler can make a 911 call in the United States as long as the traveler's mobile phone can connect to the local wireless network. In an NG911 environment, an international traveler's home ASP can route an emergency call to the appropriate PSAP in the United States, even if the ASP is located in another country.⁹² However, regulatory arrangements may be needed to make this call routing feasible. Should these types of calls be supported by NG911? What kind of arrangements and regulatory changes will be needed to facilitate these calls?</p>
<p>Shadow Me believes strongly in the uniformity of experience. Security concerns are unique to a particular geography. A US user travelling abroad should be able to access the same emergency response apparatus as they are able to in their home country. That is why Shadow Me has developed and deployed a truly international product that works anywhere in the world, connecting a user to the same emergency response in a foreign country as in their home.</p>	